

Message

From: Stauffer, Panah [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=50083CE00E384879B4E4E066B0923C22-BHALLA, PANAH]
Sent: 9/13/2019 7:35:51 PM
To: Densberger, Matthew@ARB [Matthew.Densberger@arb.ca.gov]
CC: Dave Conway [dconway@mariposacounty.org]; Xu, Jin@ARB [jin.xu@arb.ca.gov]; Smith, Noah [SMITH.NOAH@EPA.GOV]
Subject: RE: Mariposa County Emergency Episode Plan

Thanks, Matthew!

Hi Dave,

Please see my notes below. Feel free to give me a call if you have any questions or concerns.

Best,
Panah

Panah Stauffer
Air Division (AIR-2)
US EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105
415-972-3247

From: Densberger, Matthew@ARB <Matthew.Densberger@arb.ca.gov>
Sent: Thursday, September 12, 2019 2:45 PM
To: Stauffer, Panah <Stauffer.Panah@epa.gov>
Cc: Dave Conway <dconway@mariposacounty.org>; Xu, Jin@ARB <jin.xu@arb.ca.gov>; Smith, Noah <SMITH.NOAH@EPA.GOV>
Subject: Mariposa County Emergency Episode Plan

Hello Panah,

CARB would like your input on how to best proceed with an aspect of Mariposa County's ozone EEP. Past emissions estimates from Yosemite boilers & generators were based on an aggregate emissions estimate with most sources being located within the Yosemite Valley. Is it acceptable to report the aggregate emissions (~6 tons/year NOx) in the highest emissions facilities table?

Yes, that should be fine. Matthew explained that it's not possible to break out the sources in Yosemite Valley individually, so aggregation is fine.

CARB staff is of the opinion that it is reasonable to list it as an aggregate estimate, as individually the sources would almost certainly be too small to list – and the county has very few sources to note. We believe that including an aggregate estimate with a footnote mentioning as such would be preferred. Yes, sounds good.

Additionally, if the county has no jurisdiction over the national park sources, a note/sentence should be included to inform as such (I'm guessing the district cannot require the park to shut down sources, but am not familiar enough with the laws to be certain).

Clean Air Act Section 118 requires Federal agencies to comply with state and local limits on air pollution (unless the President specifically exempts a Federal source):

<https://www.govinfo.gov/content/pkg/USCODE-2017-title42/pdf/USCODE-2017-title42-chap85-subchapl-partA-sec7418.pdf>

We also are thinking, depending on how the district wants to take the plan, they could potentially include something short (couple sentences or quick paragraph) mentioning their very low ROG/NOx emissions and that permitted sources would contribute very little to an emergency episode, which would most likely be caused by transport and require requests/cooperation from surrounding areas – calling out the low emissions values in support of the statement. And maybe they already have this included... I haven't reviewed their plan yet.

It's fine to include that kind of description. I assume that this plan, like the other plans, would have control actions that address mobile sources or whichever types of sources would be the greatest contributors to ozone in an emergency.

Looking forward to your thinking. Also, I will be out of the office tomorrow and Monday; so, I've included Dave Conway in CC so Mariposa County can act upon any response more quickly.

Thanks and Best Regards,

Matthew Densberger
Air Quality Analysis Section
California Air Resources Board | AQPSD
Matthew.Densberger@arb.ca.gov
Ph# (916)324-7169